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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, WILLIAM BYATT,
 JEREMY DAVIS, CHRISTOPHER
 CASTILLO, and MONIQUE TRUJILLO
 individually and on behalf of all similarly
 situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No.: 4:20-cv-03664-YGR-SVK

**PLAINTIFFS' SUPPLEMENT IN
 SUPPORT OF REQUEST FOR
 REIMBURSEMENT OF ATTORNEYS'
 FEES AND COSTS INCURRED FOR
 SUCCESSFUL SANCTIONS MOTION**

The Honorable Susan van Keulen

Pursuant to the Court's June 7, 2022 Order (Dkt. 603), Plaintiffs respectfully submit this supplement in support of their request for reimbursement of the fees and costs incurred in bringing their motion for sanctions, which the Court granted in part on May 20, 2022 (Dkts. 588 (sealed), 593-3 (redacted)).

In preparing this submission, Plaintiffs realized that their prior submission (Dkt. 597) incorporated certain time entries associated with travel for the April 21, 2022 evidentiary hearing. Plaintiffs do not seek reimbursement for attorney travel time, so those entries are being removed. *See* Second Mao Declaration ¶ 3. Instead of \$992,172 in attorneys' fees, Plaintiffs now seek \$981,947 in attorneys' fees. *Id.* In addition, as before, Plaintiffs seek \$28,892 in experts' fees and \$57,860.43 in costs—with Plaintiffs now seeking a total of \$1,068,699.43. *Id.*

The \$981,947.00 in attorneys' fees were incurred as follows:

Task	Hours	Total
(1) Drafting all documents filed with the Court (including review of Google's opposition to the motion for sanctions)	405.9	\$305,930.50
(2) Hearing preparation and participation	674.8	\$622,396.50
(3) Reviewing Google document productions	72.6	\$53,620.00
Total	1153.30	\$981,947.00

Second Mao Declaration ¶ 4.

Should the Court so request, Plaintiffs remain willing to submit detailed time records for *in camera* review.

Dated: June 17, 2022

Respectfully submitted,

By: /s/Mark Mao

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